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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No.: 2:16-CR-00200-JCM-PAL
Plaintiff,)	
)	
)	<u>STIPULATION TO CONTINUE</u>
vs.)	<u>SENTENCING HEARING</u>
)	(Third Request)
)	
)	
ASHLEY ZAMBUTO,)	
Defendant.)	
)	

Defendant, Ashley Zambuto, by and through her attorney of record, Robert M. Draskovich, Esq., and Plaintiff United States of America, by and through STEVEN W. MYHRE, Acting United States Attorney, and Daniel Cowhig, Assistant United States Attorney, stipulate and request that the Court continue her sentencing hearing, currently scheduled for October 23, 2017, until May of 2018 or to a date convenient for the Court. The government's investigation into related criminal activity by others is ongoing. The defendant's plea agreement includes cooperation provisions. The instant case is related to USA v Boyar, et al. A trial date is currently set in March of 2018.

Accordingly, in the view of the government and the defendant, this case is not ripe for sentencing. Defendant Zambuto is not in custody, and specifically requests this continuance. Defendant Zambuto is in compliance with her release conditions. Defendant Zambuto waives any right she may have to a speedy sentencing in this matter.

WHEREFORE, the parties stipulate and request that the Court continue defendant Zambuto's sentencing hearing, currently scheduled for October 23, 2017 until May of 2018 or to a date convenient for the Court.

RESPECTFULLY SUBMITTED this 27th day of July, 2017.

/s/ Daniel Cowhig
DANIEL COWHIG
Assistant United States Attorney

By: /s/ Robert M. Draskovich, Esq.
ROBERT M. DRASKOVICH, Esq.
Counsel for defendant Zambuto

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,) Case No.: 2:16-CR-00200-JCM-PAL
4)
5 Plaintiff,)
6) **ORDER CONTINUING SENTENCING**
7 vs.) **HEARING**
8)
9 ASHLEY ZAMBUTO,)
10)
11 Defendant.)
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25 This matter comes before the Court on the parties Stipulation to Continue Sentencing.
26 Based on the stipulation of the parties, and good cause appearing therefore, the Court hereby
27 finds that:

28 1. The government's investigation into related criminal activity by others is ongoing.
29 The defendant's plea agreement includes cooperation provisions. The instant case is related to
30 USA v Boyar, et al. A trial date is currently set in March of 2018. Accordingly, in the view of
31 the government and the defendant, this case is not ripe for sentencing. Defendant Zambuto is
32 not in custody and has no objection to a continuance of her sentencing hearing, currently
33 scheduled for October 23, 2017 until May of 2018 or to a date convenient for the Court.

34 2. The Court hereby concludes that the ends of justice are best served by granting this
35 continuance of defendant Zambuto's sentencing.

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IT IS SO ORDERED August 2, 2017.

James C. Mahan
UNITED STATES DISTRICT JUDGE

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